

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

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Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket No. 763**

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS'  
MOTION FOR ENTRY OF AN ORDER (I) APPROVING CLOSING  
AGREEMENT WITH UNITED STEELWORKERS AND  
(II) GRANTING RELATED RELIEF**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been received to the *Debtors’ Motion for Entry of an Order (I) Approving Closing Agreement with United Steelworkers and (II) Granting Related Relief* [Docket No. 763] (the “Motion”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on April 28, 2025. Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”). Pursuant to the Notice of Motion, objections or responses to the Motion were to be filed and served on the undersigned counsel by May 12, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). The undersigned further certifies that the Objection Deadline has passed, the Court’s docket has been reviewed in these cases, and no answer, objection, or other

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

responsive pleading to the Motion appears thereon. It is hereby respectfully requested that the proposed Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: May 13, 2025  
Wilmington, Delaware

/s/ Jack M. Dougherty

**COLE SCHOTZ P.C.**

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